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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the Low-Income Energy Efficiency Programs of California's Energy Utilities.

Rulemaking 07-01-042  
(Filed January 25, 2007)

Southern California Edison Company's (U 338-E) Application for Approval of SCE's "Change A Light, Change the World," Compact Fluorescent Lamp Program.

Application 07-05-010  
(Filed May 10, 2007)

**RESPONSE OF  
SOUTHWEST GAS CORPORATION  
(U 905 G)  
ON THE SEPTEMBER 27, 2007, ADMINISTRATIVE LAW JUDGE'S RULING  
SEEKING COMMENTS ON ISSUES RAISED IN THE KEMA REPORT  
AND ON NATURAL GAS APPLIANCE TESTING ISSUES**

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Dated: October 16, 2007

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**I.  
INTRODUCTION**

On January 25, 2007, the California Public Utilities Commission (Commission) issued an order to initiate review of the broad policies, procedures and rules for the Low Income Energy Efficiency (LIEE) programs of the California energy utilities. In response, the Commission held workshops on June 13 and June 25, 2007, to address furnace replacements and Natural Gas Appliance Testing (NGAT). The ALJ of record issued a ruling on September 14, 2007, directing the parties to address questions to allow the Commission to create a record on NGAT. On September 27, 2007, another ruling was issued by the ALJ seeking comments about KEMA's "Final Report on Phase 2 Low-Income Needs Assessment" (KEMA Report) and also requested comments on possible modifications to the NGAT program that supplemented questions posed in the September 14, 2007, ruling.

Southwest hereby provides the following responses to the questions posed in the ALJ's rulings.

## **II. DISCUSSION**

### **NGAT ISSUES**

#### **1. What are the specific challenges associated with the current NGAT process?**

There are two challenges in utilizing an NGAT testing protocol as a means of ensuring the safe installation of weatherization measures in a home. First, at present, the Commission-approved NGAT protocol calls for utilities to conduct pre-checks before weatherization measures are installed and a full NGAT after the measures are installed. Since the pre-NGAT check is not as comprehensive as the post-test, there is a strong possibility that something may be missed, resulting in the creation of a hazardous situation and/or an expensive repair. Thus, contractors must consider the cost and liability that installations without a full pre-test may cause for them personally. Furthermore, under the current program, there are many obstacles to repair or replacement of those dangerous appliances; thus, it may be necessary for contractors to cap and abandon appliances, which the low-income customers cannot readily afford to repair or which a landlord may choose to ignore.

Second, there is a general lack of understanding by customers about why the test is necessary and why an NGAT “fail” prohibits the installation of infiltration-reduction measures. Commonly, customers feel that the contractor chooses when to install measures, based upon a perceived lack of concern. Although this is not true, it is often difficult to change this public perception.

#### **2. How are low-income customers affected by the current NGAT process?**

Low-income customers’ homes are affected both positively and negatively under the current NGAT protocols. On the positive side, the current NGAT ensures that measures are installed safely and gas appliances are inspected and repaired/replaced, when feasible. In contrast, the current testing also precludes the installation of infiltration reduction measures if the gas appliance may not be repaired/replaced. This is typically due to budgetary restrictions or renter vs. owner policies.

#### **3. How can the utilities improve the current NGAT process? In that regard, what, if anything, would the Commission need to order the utilities to do? How would each utility program modification affect customer bills, reduce energy use, or**

**address customer health, safety and comfort?**

Many ideas for the improvement of the NGAT process were proposed during the NGAT technical workshop on June 25, 2007. Southwest recommends the Commission allow the utilities to incorporate the recommendations developed during the workshop into the current practices and protocols, including: (1) elimination of obsolete requirements, which would make the program more cost-effective (i.e., decrease in stringency of the vent termination language, waiving clearances requirements for abandoned units, clarify that the “operational appliances” requirement refers to natural draft furnaces.); (2) adoption of the proposed changes to the NGAT standards to correct inconsistent language; and (3) increased Commission direction provided to the utilities regarding LIEE policies and procedures when questions and program modifications arise. These modifications to the NGAT process would allow additional infiltration measures to be installed, thus reducing energy consumption and increasing comfort.

**4. How many residences in your territory received LIEE measures and services during 2006?**

Southwest serviced 798 homes in 2006. All of these homes were treated and 781 were weatherized.

**5. How many of the homes served with LIEE services in 2006 had problems with non-infiltration measures? The purpose of this question is related to non-equipment concerns.**

Southwest’s LIEE program contractors have not encountered any problems with non-infiltration measures. All measures found to be feasible during the assessment of the home were installed. Although some homes may not receive infiltration reduction measures as a result of NGAT, the LIEE program contractors understand the safety concerns which prompt this decision and are able to explain to customers the rationale for limiting program benefits. Naturally, most customers would prefer to receive the maximum number of measures in order to feel that the process is worth the effort of enrollment; however, safety concerns may necessarily limit the number and type of measures installed. This decision is explained to, and is generally understood by, the customers receiving LIEE program services.

**6. How many of the homes served with LIEE services during 2006 were denied services due to an NGAT failure? The purpose of this question is to determine**

**which homes had problems with the equipment itself.**

LIEE program services are never denied completely, but limited depending on the NGAT results. All homes received some form of service.

**7. When a house fails an NGAT, how does the utility coordinate with other programs such as LIHEAP?**

Southwest only contracts with Community-Based Organizations (CBOs) to install LIEE program services. These CBOs are also LIHEAP providers and, where possible, the CBOs leverage the LIEE and LIHEAP services to maximize the benefit to the customer and install all possible measures in every qualified home.

**KEMA REPORT ISSUES**

**1. Eligibility Calculations**

As required in the “Final Opinion: Post-2002 Low-Income Assistance Programs for Small and Multi-Jurisdictional Utilities (Decision 03-03-007),” the Commission:

Directed that Phase 2 of the Needs Assessment Study include an examination of the demographics within each of the SMJU’s service territories based on updated Census information. As Energy Division suggests, we will accept the SMJUs’ estimates of eligible population for the purpose of calculating penetration rates until the results of this study are available and can be evaluated for the development of a more precise method.

The data included in the KEMA Report for the SMJUs is limited to the items listed above. Due to the small amount of data reviewed for the SMJUs in the KEMA Report, Southwest is unable to adequately respond to most of the questions listed in the ALJ’s Ruling.

Although the KEMA Report is extensive in its analysis, Southwest wishes to clarify or restate inaccurate data contained in the report. For example, Table 4-2 inaccurately indicates 53,550 of Southwest’s customers are technically and demographically eligible for CARE at 200 percent of poverty in 2005. Southwest agrees that in 2005 the participation level in Table 5-2 of 32,200 is correct; however, Southwest calculates the total estimated CARE eligible to be 40,169. This is a difference of over 13,000 customers, which leads to a 20 percent difference in the CARE-calculated participation rate, as referenced in Table 5-6. Furthermore, it appears that the sample size of households surveyed for the KEMA Report is targeted towards the IOUs and does not actively include the SMJUs.

Southwest estimates eligibility data for each geographic region of its service area (e.g. Victorville, Big Bear, Needles, South Lake Tahoe, Truckee, etc.) by utilizing economic and demographic survey data. Specifically, cross-tabulations of income and persons per household information from survey data provide the basis for the estimates. The most recent Census data is reviewed as a reasonableness check of the estimates.

Although Southwest does not know the specific reason for the difference in the estimated customers eligible between the KEMA Report and Southwest's calculations for the Low-Income Assistance Program Annual and Mid-Year Status Reports, it is important to note that Southwest has a segmented service area with varied demographic characteristics. For instance, approximately 50 percent of the residential customers in Southwest's Northern California service area are secondary customers and are not eligible to participate in the CARE and LIEE programs. Additionally, the percent of customers eligible by service area varies greatly. Southwest estimates, as of December 2006, that 37 percent of its Southern California primary residential customers are eligible for the CARE and LIEE programs, compared to 12 percent in its Northern California service area.

Due to the discrepancies in the KEMA Report, the Commission should require KEMA to work with the SMJUs to correct the estimated eligible numbers. Southwest commits to working with KEMA to accurately determine the estimated eligible customers for both the CARE and LIEE programs.

## **2. Utility Coordination – Question No. 7**

Question No. 7 asks how the utilities can coordinate their low-income programs with those of other regulated utilities and municipal utilities statewide. Southwest coordinates its LIEE program with electric utilities in all of its service areas. These utilities include: Southern California Edison (high desert area including Victorville and surrounding areas), Bear Valley Electric Service (Big Bear), and Sierra Pacific Power Company (Lake Tahoe and Truckee).

### **III. CONCLUSION**

Southwest appreciates the opportunity to comment on both NGAT and the KEMA Report. Southwest looks forward to assisting the Commission in its efforts to refine the policies, procedures and rules for the LIEE programs of California energy utilities, including

improving the NGAT process and working with KEMA to develop the appropriate number of estimated eligible customers for the KEMA Report.

Dated at Las Vegas, Nevada this 16<sup>th</sup> day of October, 2007.

/s/ Francisco V. Aguilar

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **RESPONSE OF SOUTHWEST GAS CORPORATION (U 905 G) ON THE SEPTEMBER 27, 2007, ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON ISSUES RAISED IN THE KEMA REPORT AND ON NATURAL GAS APPLIANCE TESTING ISSUES** on each party named on the official service list in proceeding R.07-01-042 by electronic mail or regular first-class mail.

Dated at Las Vegas, Nevada, this 16<sup>th</sup> day of October, 2007.

/s/ Valerie J. Ontiveroz  
An employee of Southwest Gas Corporation



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**Last Updated: October 3, 2007**

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